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March 4, 2025

**VIA ECF**

The Honorable Harvey Bartel III  
United States District Judge  
Eastern District of Pennsylvania  
16614 U.S. Courthouse, Courtroom 16-A  
601 Market Street  
Philadelphia, PA 19106

Re: Atlas Data Privacy Corporation et al v. Innovative Web Solutions, LLC et al.  
Case No.: 1:25-cv-01535-HB  
GRSM File No.: 1385011

Dear Judge Bartel:

This firm represents the interests of Defendant in the above-referenced matter. We write in response to the Court's Notice of Telephone Conference setting at telephone conference in this matter for March 5, 2025. ECF No. 5. As a preliminary matter, the undersigned counsel will be on a flight traveling back from a deposition at the time proposed and respectfully requests an adjournment to a later date that is convenient for the Court and all parties. Counsel for Defendant has conferred with counsel for Plaintiffs who does not oppose this request.

Additionally, counsel for Defendant has conferred with counsel for Plaintiffs regarding the telephone conference and proposed schedule for moving forward with this matter following the filing of Defendant's notice of removal. Counsel for Plaintiffs has advised that Plaintiffs do not intend to move to remand. Additionally, the Parties agreed that, subject to the Court's approval, Defendant shall file a motion joining in the motion to dismiss on constitutional law grounds that was filed by the other defendants in the Daniel's Law cases, as the Court has done in other Daniel's Law matters, so that Defendant may preserve its rights to join in the pending motion for leave to appeal to the Third Circuit. The Parties also agreed that, subject to the Court's approval, this matter shall be joined with the other Daniel's Law cases for purposes of case management and scheduling, including but not limited to the upcoming deadline of March 18, 2025.

Should this proposal meet the Court's approval, the Parties respectfully request that the Court enter an order adopting same. To the extent a telephone conference is necessary, the Parties are happy to attend at a later date that is convenient for the Court and all Parties.

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We thank the Court for its consideration of this request.

Respectfully Submitted,

GORDON REES SCULLY MANSUKHANI, LLP

*/s/ Clair E. Wischusen*

Clair E. Wischusen, Esq.

CC: All counsel of record via ECF